

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

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| IN RE: Cases Transferred to TNMD from In re: Taxotere (Docetaxel) Products Liability Litigation, MDL No. 16-2740 (LAED) | District Judge William L. Campbell, Jr. Magistrate Judge Barbara D. Holmes |
| SYLVIA JACKSON v. SANOFI US SERVICES, INC. <i>et al.</i> | Case No. 3:23-cv-00553 |

JOINT STATUS REPORT

I. DETAILS OF THE PARTIES' PROGRESS TOWARDS DISCOVERY

Plaintiff has produced photographs and Sanofi has collected medical records pursuant to authorizations previously provided by Plaintiff. The parties have also deposed Plaintiff and her prescribing physician. Sanofi is working to identify additional fact witnesses to depose, and it anticipates coordination of those depositions in the next two months. Initial fact witness depositions will likely include family members that accompanied Ms. Jackson to her appointments when the risks and benefits of her chemotherapy options were discussed, the health care professional who consented Ms. Jackson prior to her chemotherapy treatment, and witnesses that can attest to Ms. Jackson's damages.

II. ANTICIPATED DISCOVERY DISPUTES

There are no known or anticipated discovery disputes.

III. PARTIES' ATTEMPTS AT RESOLUTION OF THE CASE

The MDL court has appointed a settlement master with whom the parties have worked with for the past few years. More recently, Judge North of the Eastern District of Louisiana has helped mediate between Plaintiff MDL Leadership and Sanofi. Although the parties have not discussed resolution of Ms. Jackson's specific case, there have also been ongoing discussions with Sanofi about resolution of the Johnson Law Group's Taxotere cases, including an in-person meeting in Kansas City that occurred in October 2023. The parties have not reached a settlement to date. However, given these global and firm-wide resolution efforts, the parties do not believe this matter is suitable for another form of alternative dispute resolution at this time.

IV. OTHER MATTERS FOR THE COURT TO CONSIDER

Since the last status conference, the parties have fully briefed Plaintiff's Motion for Leave to Amend her Complaint. Aside from the Court's ruling on this motion, there are no known or anticipated matters that require action of the Court at this time.

V. CASE MANAGEMENT DETAILS

This case is on track according to the case management schedule.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2024, copies of this Joint Status Report were served on all parties of record via the Court's CM/ECF system.

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